

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re <u>Diane M. Hartman</u>	Case No.	<u>19-16069/mdc</u>
Debtor	Chapter	<u>13</u>

IN RE: DIANE M. HARTMAN
Debtor

:

Nationstar Mortgage, LLC

: CHAPTER 13 No. 19-16069/mdc

vs.

: 11 U.S.C. Section 362 and 1301

Diane M. Hartman
Debtor

:

David F. Hartman
Co-Debtor

:

**RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY
OF NATIONSTAR MORTGAGE, LLC**

1. Admitted

2. Admitted.

3. Denied. The averments in this paragraph are legal conclusions to which no response is required.

4. Admitted.

5. Admitted.

6. Admitted.

7. Denied. It is specifically denied that debtor has not made the mortgage payments from June/2023 through September/2023. Debtor will provide proof that she has made all of her post-petition mortgage payments.

8. Denied. The averments in this paragraph are legal conclusions to which no response is required.

9. Denied. The averments in this paragraph are legal conclusions to which no response is required.

10. Denied. The averments in this paragraph are legal conclusions to which no response is required.

11. Denied. It is specifically denied that Movant is entitled to relief from stay for cause since Debtor has made all of her mortgage payments.

12. Denied. The averments in this paragraph are legal conclusions to which no response is required.

13. Denied. The averments in this paragraph are legal conclusions to which no response is required.

WHEREFORE, Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Stay be denied.

Respectfully submitted:

Dated: September 18, 2023

/s/ Bradly E. Allen, Esquire
Attorney for Debtor, Diane Hartman
7711 Castor Ave.
Philadelphia, PA 19152
P-215-725-4242

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ORDER

AND NOW, This day of , 2023, upon Motion for Relief from Automatic Stay
of Nationstar Mortgage, LLC and Debtor's Response it is hereby:

ORDERED that the Motion for Relief of Nationstar Mortgage, LLC is denied.

BY THE COURT:

**HONORABLE MAGDELINE D. COLEMAN
U.S. BANKRUPTCY JUDGE**